

US EPA ARCHIVE DOCUMENT

5/2/83



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 2 1983
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MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: Proposed Section 18 exemption for the use of
vinclozolin (Ronilan) on leaf lettuce.

FROM: Edward Zager, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Donald Stubbs, Product Manager
Emergency Response Section
Registration Division (TS-767)

and
Toxicology Branch
Hazard Evaluation Division (TS-769)

Edward Zager

The Ohio Department of Agriculture requests a Section 18 exemption for the use of vinclozolin (3-(3,5-dichlorophenyl)-5-methyl-2,4-oxazolidinedione, Ronilan) for the control of lettuce drop on leaf lettuce.

Section 18 exemptions for the use of vinclozolin on lettuce were issued in the past.

In our review of PP#2F2595 we recommended for the establishment of a 10 ppm tolerance for residues of Ronilan on lettuce (K.H. Arne, 6/11/82).

The proposed use calls for 2 applications at the rate of 0.75 lb-1 lb act/A.

The first application will be made at thinning time and the second application 14 days later. A 28 day PHI will be observed.

The available residue data (submitted with PP#9G2204) reflecting Ronilan applications to head lettuce are summarized in the following table:

<u>Location</u>	<u>Variety</u>	<u>Rate (lb a.i./A</u>	<u>No appl.</u>	<u>PHI (days)</u>	<u>Residue (ppm)</u>
CA	Salinas	1.0	2	24	4.82
CA	"	1.0	1	47	0.16
MI	Ithaca	0.5	3	30	1.43
MI	"	1.0	3	30	7.30
NJ	"	1.0	2	56	1.82
NJ	"	1.0	3	49	0.41
NY	"	1.0	3	56	0.05-0.07
WI	"	1.0	2	27	0.07
NY	"	0.5	5	9	6.15-10.7
NY	"	0.75	5	9	1.07-13.2
OH	Boston	1.0	3	14	1.32
TX	Iceberg	0.75	2	15	0.59-0.74
TX	Great Lake	0.75	2	29	0.49-1.48
CA	Salinas	1.0	1	14	0.59
"	"	"	"	0	60
"	"	"	"	1	48.5
"	"	"	"	3	17.2
"	"	"	"	5	14.6
"	"	"	"	7	7.35
"	"	"	"	11	2.19
"	"	"	"	14	1.42
"	"	"	"	21	0.96
"	"	"	"	24	4.82
NJ	Ithaca	1.0	2	14	1.66
"	"	"	"	0	17.8
"	"	"	"	1	12.3
"	"	"	"	3	8.4
"	"	"	"	5	4.04
"	"	"	"	7	3.40
"	"	"	"	11	2.51
"	"	"	"	14	1.34
"	"	"	"	21	0.88
"	"	"	"	24	0.56
"	"	"	"	35	0.55
"	"	"	"	56	1.82

In view of the relatively long PHI of 228 days, we consider the residue data for head lettuce translatable to leaf lettuce.

Based on these data we estimate that residues of vinclozolin and its 3,5-dichloroaniline containing metabolites will not exceed 10 ppm in or on leaf lettuce as a result of the proposed use.

Meat, Milk, Poultry and Eggs

There are no feed items involved in this use and consequently no problem with secondary residues in meat, milk, poultry and eggs is expected from this use.

Conclusions

1. Residues of vinclozolin and its 3,5-dichloroaniline containing metabolites will not exceed 10 ppm in or on leaf lettuce as a result of the proposed use.
2. There will be no problem with secondary residues of vinclozolin in meat, milk, poultry and eggs.

Recommendation

TOX considerations permitting we have no objections to the issuance of this Section 18 exemption.

An appropriate agreement should be made with FDA regarding the legal status of the treated commodities in commerce.

cc: R.F., Subject file Vinclozolin, Section 18 S.F., Circu,
E. Zager, TOX

RDI:Section Head:RJH>Date:4/22/83:RDS>Date:4/22/83

TS-769:RCB:Reviewer:E.Zager:LDT:557-7324:CM#2:RM:810>Date:4/26/83